

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

JANET JENKINS, for herself and as
next friend of ISABELLA MILLER-
JENKINS, A/K/A ISABELLA
MILLER,
Plaintiffs

v.

Civil No. 2:12-cv-184-wks

KENNETH L. MILLER, LISA ANN
MILLER, F/K/A LISA MILLER-
JENKINS, TIMOTHY D. MILLER,
RESPONSE UNLIMITED, INC., for itself
and as an agent of LIBERTY COUNSEL,
LLC, PHILIP ZODHIATES, individually
and as agent for RESPONSE UNLIMITED,
INC., VICTORIA HYDEN, f/k/a
VICTORIA ZODHIATES, individually
and as agent for both RESPONSE
UNLIMITED, INC., LINDA M. WALL,
MATHEW D. STAVER, individually and
as agent for LIBERTY COUNSEL, LLC,
RENA M. LINDEVALDSEN, individually
and as agent for LIBERTY COUNSEL,
LLC, and LIBERTY COUNSEL, LLC,
Defendants

MOTION TO DISMISS WITH PREJUDICE

COMES NOW Isabella Miller, by and through her attorney, Deborah T. Bucknam,
Esq. and hereby moves this Honorable Court to dismiss all claims by Isabella Miller/aka
Isabella Miller-Jenkins, with prejudice, against all Defendants, pursuant to FRCP 41 (2).
Attached hereto and incorporated herein in support of this Motion are the following:

1. Affidavit of Isabella Miller dated January 24, 2021. [Exhibit 1].
2. Affidavit of Isabella Miller dated January 25, 2021 [Exhibit 2]

Date: February 10, 2021

Respectfully submitted,
ISABELLA MILLER,
By her counsel,

/s/ Deborah T. Bucknam, Esq.

Deborah T. Bucknam, Esq.
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